

Remarks

Reconsideration and allowance are requested in view of the above amendments and the remarks below. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application.

Claims 19-40 are rejected under 35 U.S.C. 103(a) over Lambert (6,724,324) and in view of Kawahara (6,462,563). This rejection is defective because Lambert and Kawahara, alone or in combination, fail to disclose each and every feature set forth in the claims as required by 35 U.S.C. 103(a).

The present invention relates to a device and a method for the capacitive position finding of a target object.

One aspect of the present invention relates to the provision of coupling capacitances which, together with capacitive probes, in each case form capacitive voltage dividers. In accordance with the present invention, the coupling capacitances **remain uninfluenced** by an approaching target. This feature has been added to independent claims 19, 35, and 40. Support for this amendment can be found, for example, on page 7, last paragraph, to page 8, first paragraph, of the original specification as filed.

Thus, according to the invention and unlike the prior art, there is not a direct supply to the capacitive probes, which can also be referred to as measuring probes.

Instead, a voltage divider is built up via the coupling capacitances and the measuring capacitances.

Further, unlike Lambert, where the term coupling capacitances is understood to mean a capacitance, the coupling of which is varied by an approaching object, the term "coupling capacitances" in accordance with the present invention is understood to mean a "coupling in" capacitance. Thus, it is the capacitance by means of which the AC voltage is coupled onto the measuring probe.

Applicants submit that neither Lambert nor Kawahara disclose a voltage divider with a coupling capacitance that remains uninfluenced by an approaching target. More precisely, the principle of measurement of Lambert essentially consists in the measurement of the difference of wanted and unwanted capacitances, i.e., stray capacitances. Contrastingly, according to the present invention, the coupling capacitance always remains substantially the same and is uninfluenced by an approaching target.

The present invention has numerous advantages over Lambert and Kawahara. For example, the inventive probe arrangement can be implemented with discrete capacitances. Unlike Lambert and Kawahara, in the present invention initially the follow-up capacitance is modified by the approach of an object. Such a follow-up capacitance is not present in Lambert and Kawahara.

In summary, numerous differences exist between the present invention and Lambert, including:

- (1) The measurement principle of Lambert is necessarily based on the change of the capacitance which, in the terminology of the current application,

is a "coupling capacitance". These coupling capacitances, in the current invention however, remain essentially unchanged.

(2) Lambert fails to disclose that the potentials of the probes are the "middle voltages" of the capacitive voltage-dividers.

Kawahara, which has been cited by the Examiner only as allegedly disclosing the use of a plurality of capacitive probes, fails to remedy the deficiencies of Lambert.

Accordingly, Applicants submit that independent claims 19, 35, and 40, and their corresponding dependent claims, are allowable.

With respect to the dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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